

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

**KAREN M. TUCKER,
Defendant.**

No. 1:2010-mj-00964-MBB-1

ASSENTED TO MOTION TO CONTINUE

The defendant, Karen M. Tucker (“the defendant”), by and through her attorneys, respectfully requests that the probable cause/detention hearings scheduled in this case for September 8, 2010 be continued for another week until September 15, 2010.

As grounds, the defendant states that her attorneys are in the process of exploring the possibility of a pre-indictment disposition in this case in order to, inter alia, limit her possible criminal exposure. While the related discussions must be viewed as preliminary in nature, and without prejudice to the defendant, the parties are already engaged in ongoing discussions to ascertain whether or not such a resolution is, in fact, possible. Because of this, undersigned counsel has indicated to the government their inclination to waive both probable cause and detention, the latter “without prejudice”¹. However, they have not yet been able to discuss the ramification(s) of doing so with the defendant, who is currently housed out-of-state at the Donald W. Wyatt Detention Center in Central Falls, RI, and/or to seek her consent to so waive. Counsel is requesting the additional time in order to be afforded the opportunity and sufficient time to

¹ With leave to revisit the question of detention and/or a motion for defendant’s possible release, subject to an electronic bracelet and GPS monitoring, at a later time.

travel to Rhode Island to discuss such proposed waivers of right with the defendant, as well as to inform her of the status of negotiations with the government, the latter of which is somewhat time-constrained by the government's obligation to indict this case by September 22.

The government specifically assents to the requested continuance for the stated purpose, and the defendant agrees to the excludability of the intervening time should this motion be granted. Moreover, should arraignment in this judicial district on the underlying complaint still be required, the defendant further agrees to a continuance to the requested date for that purpose as well, and she maintains that the interests of justice are best served by the granting of this motion.

WHEREFORE, the defendant respectfully requests that her motion to continue this case until September 15, 2010 for all pending purposes, be granted.

Dated: September 2, 2010

Respectfully submitted,
KAREN M. TUCKER
By and through his attorneys,

/s/ R. Bradford Bailey
R. Bradford Bailey, BBO#549749
Jeffrey A. Denner, BBO#120520
DENNER♦PELLEGRINO, LLP
Four Longfellow Place, 35th Floor
Boston, Massachusetts 02114
Tel.: (617) 227-2800
Fax: (617) 973-1562
bbailey@dennerpellegrino.com
jdenner@dennerpellegrino.com

Certificate of Service

I, R. Bradford Bailey, hereby certify that on this the 2nd day of September 2010, I have served all parties of record registered with ECF for this matter with a true copy of the foregoing *Assented to Motion to Continue* by virtue of transmitting the same to the Court via the CM/ECF system.

/s/ R. Bradford Bailey
R. Bradford Bailey